REMARKS

The Official Action has been carefully considered, and the Examiner's comments are duly noted. Reconsideration of this Application in view of the Amendments for the claims and arguments submitted is respectfully solicited.

New claim 35 has been added to make the claim dependent on claim 27 and remove the alternative of claim 31 on 27. The claims now in this Application are 18 to 35.

Before considering the specific objections and the amended claims in detail, it should be noted that in a sense, part of the problem with the prior art used by the Examiner may be in connection with Cavazos use of terms which do not have the meaning one skilled in this art would normally give to the technical terms used. With that in mind, certain points are to be set forth before the claims are discussed in detail.

Further, some comments about the invention should be considered.

Briefly, the simple issue is that if there is not an effectively saturated vapor situation which is the distinguishing feature of the present invention then the evaporation process on which this invention depends does not work anywhere like as efficiently and must depend on convection which is very difficult in its mode. The test for saturation is whether there are both phases, e.g. water and vapor existing in the same working area (once stabilized). Once you have established this state then you have a different mechanism according to the teachings of the present invention which defines the pressure temperature relationships and which can be found in steam tables that have

existed for eons. Cavazos cannot have this state both firstly, because his structure will not allow for it to occur, and secondly, but even more importantly because he describes his process in a way that has to mean that it is a vapor only convection transfer system, e.g. pressure control, etc.

According to Applicant's understanding of the Cavazos disclosure, Cavazos is, in fact, a system that uses vapor to transfer heat where it is the physical vapor that fills the system and any transfer is by reason of convection. This means that it is a system which is very insensitive to air in the system and it would also be very inefficient.

The present invention is an evaporation system that depends on substantially all of the air being removed and the system will work to transfer, e.g. heat to change temperatures when there is a temperature differential. Otherwise it can be dormant. It may appear to be quite confusing to try to understand the system because it is an evaporation based temperature differential responsive process and not simply a heat transfer by convection process at all. The more air in the system the less efficient that the present invention will be. Also, another structural limitation that exists in the present invention is that there is always a saturated state of the vapor in the space. It depends entirely on this being the case.

In contradiction, Cavazos uses only vapor and therefore by inference does not have vapor in a saturated state in the space (there may be a marginal condition where there may be a saturated vapor state in Cavazos but if this were to exist then this would from the description only be unintentional and actually inhibitive of his process as we

understand it). This is apparent because Cavazos will not have water in the bore staying in a stable relationship with the vapor.

This is further understood if one reads the description in Cavazos as to how Cavazos actually is intended to work. Cavazos describes how he uses a pressure detector so that if the pressure in the chamber reaches a set maximum and the temperature still rises then there is an automatic introduction of more water into the system. This will only work and make sense if the system is a purely vapor based system. With more water in the system there will be a greater concentration of water vapor as compared to air which is a better transferor of heat. The inefficient convection process will presumably be made to work a little better. It is however clearly not an evaporation temperature differential system. The mere fact that temperature can continue to rise after the pressure has maxed out means that there is an unsaturated status of vapor in the system. If there is a saturated status then there is no way that the temperature and pressure will be out of kilter. This relationship of temperature and pressure will not be changed by the mere addition of water (which of course would implicitly be converted reasonably instantly into vapor).

Stated differently, the relationship between temperature and pressure for a saturated vapor is precise and invariable (this is a very fundamental principle of thermodynamics). Cavazos teaches that with his system that he does not have a fixed relationship between temperature and pressure which is a clear (in fact absolute) indication that he is not working with saturated vapor. The clincher is that if a closed environment contains a fluid in the liquid phase then the vapor in that environment must

be saturated (once stabilized). Cavazos teaches us in Column 3 line 42 to column 4 line 3 "regardless which start up method is employed, in the event that a maximum pressure in the system is reached and the mould temperature is still getting high, the make up fluid valve 36 is operated a second time automatically by a pressure switch 35 to again supply a predetermined amount of coolant to the system."

Clearly, if the system already contains water in the liquid phase and therefore fully saturated vapor, such an operation would have no effect on the system temperature apart from that caused by a small amount of heat absorbed by the "make up" water.

It should also be noted that the claims which read on the Fig. 1 embodiment use two conduits which is a clear structural difference from Cavazos. For the Fig. 2 embodiment, the open chamber shape implicitly allows for a return path which is not blocked.

The configuration must provide for a return path whether this is by way of separate conduit or by reason of the open chamber shape which then implicitly allows for a return path which will not be blocked. Both embodiments have separate return paths, which is best exemplified by the conduit in Fig. 1. Clearly Cavazos uses the same path for the leaving as well as the return, a clear structural difference.

In Cavazos, each blind bore 14 has a conduit 18 which connects with the manifold 16 (this is just a device with many openings), but only one passageway unnumbered to connect with the heat exchanger 20. Therefore, this is only a single

conduit in which fluid (= liquid or vapor) <u>must flow in both directions presumably which in practice is the problem</u>.

<u>Cavazos</u>, it is believed, means change from full liquid to "droplets" but droplets are still in the liquid phase and not the vapor phase, and "droplets" have to be interpreted as liquid because they are still in the liquid phase. Vapor is not to be confused with "wet steam" which many assume to be the vapor. "Steam" comes from a kettle when it is boiling. However this is only visible when the vapor meets the cool air and condenses into droplets. Droplets would in fact be liquid not vapor. If <u>Cavazos</u> has droplets then he has a liquid in the cavity, etc.

With respect to claim 20, this claim has been amended to clarify a further distinction between the present invention and Cavazos, and to point out why Cavazos is nowhere related to the specific subject matter of this invention. In claim 20 when reference is made to vapor, it is intended to mean that the vapor is that of the liquid only or substantially. Further, the single quantity of liquid in the liquid state is more accurately defined and the vapor above the single quantity of liquid is more specifically defined. Any air within the system may contaminate the process, but in a practical sense, it is almost impossible to remove all the air. Even if one uses the system, such as filling the chamber, then extracting the amount of water to leave a desired space, it will still leave a little or minor amount of negligible air. The practical situation is that there may be some air. Even a little or infinitesimal quantity of air will at very low pressures expand to reduce the actual proportion of water vapor which therefore reduces the efficiency of the heat transfer basis. The concept is that there is a negligible amount of

air. If we try to define a quantity of air by volume this is confusing because the air will always be mixed into the full space so that the volume is the volume of the space. It is more accurate to say that the partial pressure exerted by the air is very small compared to the partial pressure of the vapor.

Amended claims 25, 27, 28, 29, 31, and newly submitted single claim dependency claim 35 are directed to a mold arrangement to provide further structural distinction from Cavazos. The aforementioned claim has the condenser/heating means located within the mold arrangement, whereas Cavazos has its single conduit and the manifold 16 all located externally of the mold arrangement and all together forming a single pathway for outflow and inflow whereas structurally the present invention uses one pathway for outflow and another pathway for inflow.

Claims, such as claim 25 and the following claims, speak about controls and more specifically temperature control, and as set forth that the total overall temperature of the mold is maintained relatively uniform and the cooling condenses the vapor derived from a single quantity of liquid, and the Examiner is aware that Applicant has argued this point previously from the point of view of structural distinction from Cavazos, and as set forth in the method claims 32 to 34, such recitation in the claims are also submitted as being method step limitations. Reference is made to Page 7 from line 17 through line 35 to line 22 of Page 8 which clearly defines the temperature control.

Claim 25 now makes reference to a heat exchanger to condense the vapor, and now refers to a condensing/heat exchange means and covers the second embodiment.

In the Fig. 2 embodiment, the condenser/heat exchanger is defined as being within the mold structure as distinguished from externally. This is a further distinguishing feature over Cavazos.

The mold has been defined as a mold arrangement that includes a mold and a condenser/heat exchanger within the mold arrangement. Claim 25 was also amended to remove any possibility of equating droplets of moisture to vapor. Claim 27 was amended to refer to a mold arrangement.

Claim 26 makes reference to the condensing means within the closed chamber, but also no heat exchanger. It is an implicit effect that a condenser will provide an exchange of heat. The terms may act interchangeably.

Claim 27 calls for an arrangement to provide cooling – and this does include the heat exchanger.

Claim 30 has now been broken up into two claims. New claim 35 has been added and replaces claim 30 when dependent on claim 27.

According to Cavazos, see column 1, lines 47 to 50, wherein heat is transferred to a vapor and not a liquid. This is clearly different from what the present invention does and how the present invention works. In the present invention, the heat is transferred from the mold to the liquid and it is the transforming of the liquid into vapor with its very high latent heat that is the advantage of the present invention.

It should be noted that a clear distinction between the operation of Cavazos and the present invention exists. In the present invention, the temperature

determines the pressure in the chamber not the other way around. The references to the specific temperatures at various parts of the mold clearly and specifically illustrate this point. The heat transfer process controls the pressure as such namely by temperature and effecting a differential pressure which then makes the process work by causing vapor flow between the different pressures which then are caused by the temperatures.

The heat is taken from the liquid to the vapor to the condensing or heat exchange means and, in the present invention, transfer is from a liquid to a vapor to the condenser/heat exchange, so that the claims exclude transfer from only the vapor above the liquid. Cavazos takes the heat from the same place cooled liquid is added. This is a critical point and distinctive. The present invention obtains substantially all of the heat transfer because of the liquid to vapor to condenser/heat exchange route. Some incidental water and vapor will also get moved around and capture some heat but the effect is minor. By far and away the transfer is mostly, substantially by the liquid to vapor transfer route. There is, in fact, some incidental value in the water to splash over the condenser/heat exchanger because it may improve the surface transfer effect but it is not at this stage of any significance.

It should be noted that the present invention does not exclude the use of connected multiple chambers (Page 5 line 15) but clearly states the need to consider the overall dimensions of the chamber, the liquid level and the vapor space (Page 5 line 10, Page 8 line 5, claim 2). The present invention teaches the need for the chamber to extend to cover the areas from which heat is to be taken (Page 3 line 20) (Figs. 1, 2). The present invention stresses the uniformity of the temperature throughout the chamber

(Page 9 line 16) that is achieved by the combination of the chamber dimensions and the property of the phase-change liquid to absorb latent heat at constant temperature (when the pressure is held constant).

Cavazos, on the other hand, teaches the use of blind vertical holes with a significant length to diameter ratio and accepts a relatively tortuous and constricted path to a manifold (Figs. 1, 2, 3, 4, and 5) (column 4 line 24). Such an arrangement is prone to develop vapor locks so that control over the temperature in the blind holes is lost. This clearly distinguishes a chamber from blind holes.

The present invention consistently states that heat must be transferred to the liquid (Page 3 line 5, Page 3 line 19, Page 3 line 29, etc.).

Cavazos column 1 line 47 states "...most efficient cooling is when the heat of the mould is transferred not to a liquid, but to a vapour..." This contradicts column 1 line 44, Claim 4, and figures 1 and 2. It is also erroneous or out of context.

In this respect, the present invention recognizes the direct link between chamber temperature and pressure (Page 4 line 20) (Page 7 line 35) that arises from the property of the phase-change fluid, and senses pressure or temperature directly in the chamber (Fig. 1). The accuracy and uniformity of temperature on the wetted walls of the chamber are specifically stressed as a feature of the invention.

Cavazos, on the other hand, accepts a temperature sensor on the mold (Claim 1, "...actual mold temperature...") and does not appear concerned with, or at least has no teaching of, the spatial uniformity of temperature that must result from the

arrangement described (Figures 1, 2, 4). This clearly distinguishes heat transfer to a vapor and not a liquid.

Cavazos specifically teaches the opposite from the present invention. Column 1, line 47 provides that the "most efficient cooling is when the heat of the mold is transferred not to a liquid, but to a vapour which is in contact with the walls of the plurality of blind holes".

This statement directly contradicts column 1 line 39 of Cavazos, -- "I have shown that it is possible to increase the efficiency of mold cooling by causing the heat from the molding material to be transferred from the mold proper to the phase change liquid causing it to vaporize..." --.

It also contradicts the illustrations in figures 1 and 2 of Cavazos, which clearly show liquid in the blind holes, and the statement at column 1 line 34, of Cavazos --"...bores...partially filled with...liquid..." --.

At face value the statement appears to be incorrect. For example, standard texts indicate that the heat transfer coefficient to boiling water at atmospheric pressure can lie in the range 2000 to 8000 W/m^2/K, i.e. down by a factor of 100.

Cavazos does not indicate the precise meaning attached to the word "efficient", which usually refers to a ratio with an ideal value. Perhaps Cavazos has used the term in a non-technical sense to indicate effectiveness.

However, Cavazos submits (column 1 line 28) that liquid cooling -- "...resulted in too rapid a chilling of the mold..." --. (Cavazos was referring to

conventional external circulation systems, presumably near atmospheric pressure.) It is difficult to reconcile this with the statement at column 1 line 39, -- "I have shown that it is possible to *increase the efficiency of mold cooling* by causing the heat from the molding material to be transferred from the mold proper to the phase change liquid causing it to vaporize..." -- (my italics). This indicates that Cavazos' use of the word -- "efficient" -- is loose and possibly inconsistent.

The statement in column 1 line 47 of Cavazos is not in keeping with the rest of the disclosure and the reader is left uncertain as to how the invention works or indeed whether the inventor fully understood it.

With respect to mold cooling rate vs. secondary coolant flow, see column 1 line 62 -- "With the apparatus of this invention, it becomes possible to achieve a mold cooling rate which is inversely proportional to the flow rate of the secondary coolant" --. The word "inversely" is incorrect. The cooling rate cannot decrease as the coolant flow increases.

With respect to control of heat transfer, or of temperature, see column 1 line 67 "The rate of heat transfer from the mold to the phase change liquid is accurately controlled..." To be a little pedantic, this is not equivalent to temperature control. Claim 1 of Cavazos explicitly states that temperature is the set point variable.

With respect to vapor locking, please note column 4 line 24, column 1 line 32, figures 1 to 5 of Cavazos -- "...blind axially extending bores..." --. As described and illustrated, it is respectfully submitted that the Cavazos system is likely to be severely

vapor locked, and it is submitted that Cavazos has not acknowledged this in his statement at column 1 line 47.

Unless the liquid approaches the Critical Point (20 MPa in water) there is a significant density difference between liquid and vapor and there is a much larger volume of vapor emerging from the blind hole than liquid entering. Provided that there is no opportunity for a gas trap to form (i.e. small bubbles can rise continually to the vapor space), it is possible for the water to enter against the vapor flow while the vapor bubbles are small relative to the passages. With increasing heat flow, as soon as the vapor bubbles grow to a size comparable with the hole diameter, the incoming water is restricted and the hole becomes starved of liquid. As a result the transfer of heat to latent heat reduces and the hole temperature rises. Direct control of the temperature in the hole is lost at this point. As the temperature rises further the hole becomes fully filled with superheated vapor. The situation is thermally unstable because once the incoming liquid is restricted the temperature in the hole exhibits a runaway behavior, effectively locking in the vapor pocket.

The vapor lock could have been avoided by providing a circulation path to the bottom of the blind holes, an option which would surely have been obvious to Cavazos had he wanted to be certain of liquid in the holes. James ensures liquid in contact with the walls by using a chamber of sufficient dimensions to provide for vapor escape and liquid circulation.

With respect to partially filled bores, the statement at column 1 line 34, of Cavazos that the "...bores are at least partially filled...", this is an admission that the wall temperature of the bores cannot be maintained at a uniform temperature by the properties of the saturated liquid. This can be directly contrasted with Claim 2.

Cavazos has to only operate as a convection of the vapor system. Cavazos comments re efficiency do not have any sensible meaning other than to say that it is loose language that is not understood or apply any meaning to.

The claims were amended to indicate the return of the water directly to the liquid and not to the vapor or moisture phase in Cavazos above the water, and these two portions are clearly contradictory and the limitation added to the claims clearly distinguishes structurally even if the two portions, according to the Examiner, are not contradictory. Clearly, Cavazos and the present have different teachings and Cavazos does not appreciate or predicate the teachings of the present invention.

The teachings of Cavazos cannot address the manufacturing problem addressed by the present invention.

Cavazos uses conversion to and from latent heat but does not exploit the property of a saturated phase change fluid to maintain a constant temperature at constant pressure to maintain a spatially uniform temperature. Cavazos talks about conversion to and from latent heat but Cavazos uses and discloses only a structure that is not capable of using latent heat.

Cavazos' prior art may remove heat from the mold so that it might maintain a steady temperature state with spatial non-uniformly, but it cannot and does not achieve a spatially uniform cooling rate at the walls of the mold.

Cavazos has vapor-filled holes that cannot achieve the intention of the present invention which requires spatial uniformity.

It is believed that portion in Column 1, lines 14 to 21 of Cavazos' is being used by the Examiner to argue that Cavazos discloses the importance of the uniformity of the temperature. The reference in Cavazos to uniformity is a reference to uniformity of heat **REMOVAL** from a plural number of molds. The present invention EFFECTS A BALANCING OF TEMPERATURES.

BALANCING OF TEMPERATURES is a different concept from mere uniformity of heat removal. This portion therefore is not dealing with the same issue as the present invention. Cavazos is teaching a system that tries to get rid of heat as such whereas the present invention is a heat transfer process which effects a balancing of temperatures. Cavazos misses because Cavazos uses straight bore holes and Cavazos misses because his system does not allow for use of change of state as the efficient transfer technique. The present invention provides for a uniformity of temperature of the working surfaces automatically because of the nature of the process.

Clearly, a major distinction from Cavazos is about the heat transfer set forth in lines 27 to 50 of column 1 ... indicating that the heat of the mold is transferred to a vapor (and not a liquid) in contact with the walls. It is respectfully submitted that this is

a structural limitation. In the present invention, the heat is taken from the liquid and transferred to the heat exchanger but transferred in a vapor stage and not a "moisture" stage, and then condensed and supplied to the single quantity liquid. Again, for the sake of the record, moisture is not vapor.

As best as Cavazos can be interpreted from the disclosure and the claims, if there is any transfer, it is essentially by heating vapor which then presumably by convection will transfer heat that is the vapor will rise or fall depending on relative heating strata and will then transfer heat as it comes into contact with other parts of the mold, and then since it was too heavy for the vapor portion, it fell back into the liquid, whereas in the present invention, as disclosed for explanation purposes in Fig. 1, the condensed liquid in space 16 was moved into the liquid directly through conduit 6, but was taken above the liquid from the vapor in conduit 7 to the condensing apparatus. In effect, what the undersigned believes happens in Cavazos is that heat is transferred only by convection. [the vapor condenses first into droplets of liquid because one does not speak about vapor falling but droplets of liquid falling because droplets of liquid are heavier than vapor and do fall, but droplets of liquid are the liquid phase of fluid. It is doubtful that there will be any condensate at all. However, if there was any liquid, it would flow down toward the mold but would not reach the hotter parts before being revaporized. It would not get even close to the hottest parts because of the vapor lock problem the way the conduits are arranged. If Cavazos has some water it would exist only in the upper part of the system and probably help to block any rise of vapor by convection through the water.

Cavazos because it is in effect a pure vapor convection transfer system does not depend on substantial removal of air. It will improve the density and therefore the heat carrying capacity slightly if there is less air but it does not make a huge difference. In fact the way the Cavazos starts his process which is to detect moisture and then close the valve implicitly means that there will still be a lot of air in the system, not an infinitesimal amount. The air and water vapor will mix fairly uniformly so that simply detecting moisture is not a practical answer to having a total air removal effect. This suggests another important distinction between the present invention and Cavazos which is that clearly the present invention needs for effective working the substantial removal of air. Cavazos does not describe a method that would result in substantial removal of air. This also then would make sense because Cavazos depends purely on vapor shift by convection. The present invention depends on an evaporation process that depends on substantially all of the space being the vapor in fact.

Claim 18, starting in line 12 ("wherein pressure… governed … by temperature), does bring in control, and it is the temperature that effects the pressure.

Claim 18, clearly on line 2, speaks of "heat to be taken", and also note lines 6 and 7 "from which heat is to be taken". Claim 25, in lines 8 to 11, "to effect, by cooling . . . and total overall temperature of the mold is maintained relatively uniform ...". Claim 32, line 4, "… from which heat is to be taken…" The other claims have similar recitations.

Turning now more specifically to the Official Action, claims 18-21 and 25-29 were rejected as being anticipated by Cavazos under 35 U.S.C. 102(b).

The Examiner states that the liquid vapors are cooled by the condensing means (20) and the liquid then flow(s) [sic] back into the liquid (column 1, lines 38 to 46) of Cavazos. As pointed out heretofore, and as shown in the drawings, the vapor turns into droplets which first drop into the vapor and then the liquid droplets merge with the liquid below the vapor. The Examiner's statement is not what is shown in Fig. 1 of Cavazos nor specifically disclosed in the specification. In any event, the claims have all been rendered more definite to distinguish from this statement.

The mold temperature is controlled.

With respect to Column 2, lines 66, the Examiner appears to discard an essential feature of the Cavazos disclosure, and that is start-up. The Examiner is making a piece-meal selection and discarding an essential feature of Cavazos, and therefore the single quantity of liquid is an essential feature because the condensed liquid is returned directly to the single quantity of liquid and not through the intermediation of the vapor above the single quantity of liquid.

Claims 21-24 and 30 were rejected as obvious under 35 U.S.C. 103(a) as being unpatentable over Cavazos. The Examiner again indicates that after the condensing means, the liquid flows back into the liquid, but that is not what is shown in the drawings or disclosed in the specification.

Claims 31-34 were rejected as obvious under 35 U.S.C. 103(a) and therefore unpatentable over Cavazos.

The supposed alternative methods taught by Cavazos clearly does not meet the claims and is not a substitute of one for the other. Cavazos has no appreciation of the necessity of substantially complete air removal as noted above. On what basis does the Examiner allege that it is a known alternative to have the chamber filled with water and excess water pumped out.

The Examiner's response to Applicant's previous arguments does not take into consideration the structural amendments and arguments made. The condensing means is a second conduit according to the Examiner; if so, is the Examiner asking that the present invention be limited to a third conduit? The present invention also has a condensing means; does the Examiner want this condensing means designated as a third conduit? Clearly, the present invention has an outflow path as distinguished from an inflow path. A condensing means is a condenser and of course has a flow path. Applicant has recited a condensing means plus two conduits, and all that Cavazos has is a single conduit and a condensing means. Applicant provides for a single direction of flow in each conduit. Cavazos has a two-way flow in his single conduit, and therefore there is a clear structural distinction between the claims and the structure of Cavazos.

In summary, it should be noted that the present invention teaches the following features which distinguish from Cavazos.

1. Liquid in a chamber within the mold.

2. Liquid covers areas (walls of the chamber) from which heat is to be taken.

3. Chamber walls arranged to surround the mold cavity.

4. Heat from the walls vaporizes the liquid. The phase change absorbs latent heat at a constant temperature.

5. Vapor-filled space above the liquid, enclosing a heat exchanger.

6. Heat exchanger carries a coolant for removal of heat.

7. Heat exchanger condenses vapor. The phase change transfers latent heat to the coolant.

8. Condensed vapor returns to the liquid reservoir in the chamber soly to the single quantity of liquid.

9. Pressure in the space above the liquid is controlled by changing the flow rate of the coolant.

10. Chamber temperature is the sole control.

11. Air is purged by completely filling the chamber with deaerated liquid and then extracting a known volume of liquid.

All of these features have been set forth in the claim.

With respect to <u>Cavazos</u>, this discloses the following, but not the features of the present invention.

1. Plurality of closed bores (blind holes) vertically disposed in the mold.

2. Common manifold to connect plurality of blind holes.

3. Condenser vertically above the manifold.

4. Temperature at a sensor is controlled by changing the flow rate of the coolant.

5. "The rate of heat transfer from the mold to the phase change liquid is … controlled…"

6. "… bores are at least partially filled with a phase change liquid…" (Column 1 Line 34)

7. Air is purged by flushing with vapor.

8. "… most efficient cooling is when the heat of the mould is transferred not to a liquid, but to a vapour (sec)"

9. Use of moisture not vapor.

Early and favorable reconsideration is respectfully solicited, together with the allowance of claims 18 to 35.

If there are any points outstanding, the Examiner is respectfully asked to call Applicant's attorney to do what is necessary to place the Application into condition for allowance.

In order to assist the Examiner further, a CD-ROM is enclosed which was prepared by the inventor of this Application for the benefit of the Examiner, as well as the undersigned to help explain the differences between the present invention and Cavazos. This should at least be treated in the same manner as a telephone interview. If the Examiner has any questions, he is respectfully asked to call Applicant's attorney, and if the undersigned cannot answer, an answer will be obtained from the inventor.

It is further respectfully asked that a two-month extension be provided to make this paper timely filed by November 3, 2004, and our check in the amount of $215.00 is enclosed. If additional fees are necessary, please charge our Deposit Account No. 50-3108.

If there are any points outstanding, the Examiner is respectfully asked to do what is necessary to place the Application into condition for allowance.

Favorable action is solicited.

Respectfully submitted,
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